

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (CGM) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. SIX SIS AG, Defendant.	Adv. Pro. No. 12-01195 (CGM) Oral Argument Requested

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant SIX SIS AG’s Motion to Dismiss the Second Amended Complaint in the above-captioned action, the Declarations of Erin Valentine and Stephan Hänseler and exhibits thereto, and all prior pleadings and proceedings herein, Defendant SIX SIS AG (“Defendant”) will move this Court for an order dismissing the Second Amended Complaint filed by Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Second Amended Stipulation and Order, entered on October 24, 2022, all papers responsive to Defendant's Motion to Dismiss the Second Amended Complaint shall be served and filed no later than February 7, 2023, and all reply papers in further support of Defendant's Motion to Dismiss the Second Amended Complaint shall be served and filed no later than March 7, 2023.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Defendant does not consent to the entry of final orders or judgment by this Court.

Dated: New York, New York
December 13, 2022

CHAFFETZ LINDSEY LLP

By: /s/ Andreas Frischknecht
Andreas A. Frischknecht
Erin E. Valentine

1700 Broadway, 33rd Floor
New York, New York 10019
Tel. (212) 257-6960
Fax (212) 257-6950
Andreas.Frischknecht@chaffetzlindsey.com
Erin.Valentine@chaffetzlindsey.com

Attorneys for SIX SIS AG